

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO
as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor

PROMESA

TITLE III

No. 17 BK 03283-LTS

Relief of the Automatic Stay

**MOTION REQUESTING EXTENSION OF TIME TO FILE REPLY TO
OBJECTION TO LIFT OF STAY**

COMES NOW, Michael E. Danuz Reyes through the undersigned attorneys and very respectfully moves the Court for a request for extension to file the Reply to Objection of the Automatic Stay and, in support of this motion, states as follows:

I. INTRODUCTION

1. Michael E. Danuz Reyes (hereinafter, “Danuz”) is seeking the lifting of the automatic stay in the case *Michael Danuz Reyes v. Estado Libre Asociado de Puerto Rico, et al.*, Civil No. KPPE-2004-2013, before the Court of First Instance in San Juan. To that effect, it filed a Motion Requesting the Lifting of the Stay on October 19, 2018. Dkt. No. 4111

2. This Honorable Court ordered Danuz to file the Reply to the Objection to the Motion Requesting Lift of Automatic Stay by today. Dkt. No. 4113.

3. Although efforts have been made to finish the Reply we have not been able to complete it by today. Whereas, we request an extension of time of ten days, that is, until November 29, 2018 to finalize said Reply.

WHEREFORE: Danuz respectfully requests from the Honorable Court an extension of time of ten days, that is, until November 29, 2018 to file its Reply to Objection to Automatic Stay.

Respectfully submitted on this 19th day of November, 2018.

I HEREBY CERTIFY: that on this same date, copy of this motion was filed with the Clerk of the Court, using the CM/ECF System which will send notification of such filing to the attorneys of record.

INVENIO LAW LLC
PO Box 9021829
San Juan, P.R. 00902-1829
Tel. (787)724-8117/(787) 622-8800

s/Juan J. Hernández López de Victoria
U.S.D.C. No. 210713
jjhernandez@inveniolaw.com

s/Laura Beléndez Ferrero
U.S.D.C. No. 216301
lblendez@msn.com